

EXHIBIT 13

BARBARA TAGLIARINO

April 28, 2006



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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
C.A. NO. 04-12164-MLW

ERIC SOUVANNAKANE,

Plaintiff

v.

SEARS, ROEBUCK AND CO.,

Defendant

DEPOSITION OF: BARBARA TAGLIARINO

Law Offices of Kurt Olson

500 Federal Street

Andover, Massachusetts

April 28, 2006

10:05 a.m.

Charlotte C. Rosati

Registered Professional Reporter

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1 APPEARANCES:

2
3 Representing the Plaintiff:

4 LAW OFFICES OF KURT OLSON

5 500 Federal Street

6 Andover, MA 01810

7 (978) 681-0800

8 BY: KURT OLSON, ESQ.

9
10
11 Representing the Defendant:

12 SUGARNAN, ROGERS, BARSHAK & COHEN, P.C.

13 101 Merrimac Street

14 Boston, MA 02114-4001

15 (617) 227-3030

16 BY: CHRISTINE M. NETSKI, ESQ.

17
18
19 Representing Gary Mansfield:

20 PIERCE, DAVIS & PERRITANO, LLP

21 Ten Winthrop Square

22 Boston, MA 02110-1257

23 (617) 350-0950

24 BY: JOHN J. CLOHERTY III, ESQ.

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I N D E X

WITNESS: BARBARA TAGLIARINO

EXAMINATION BY: PAGE:
Mr. Olson 4

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STIPULATIONS

It is agreed by and between the parties that all objections, except objections as to the form of the questions, are reserved and may be raised at the time of trial for the first time.

It is further agreed by and between the parties that all motions to strike unresponsive answers are reserved and may be raised at the time of trial for the first time.

It is further agreed by and between the parties that the reading and signing of the deposition by the deponent may be signed under the pains and penalties of perjury within (30) thirty days of receipt.

- - -

BARBARA TAGLIARINO, having been satisfactorily identified and duly sworn by the Notary Public, deposes and states as follows:

EXAMINATION BY MR. OLSON:

Q. Good morning, Ms. Tagliarino.

A. Good morning.

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1 Q. And do you know who it was
2 specifically that did the investigation?

3 A. No.

4 Q. When did you first hear of the spill
5 at the Sears Automotive Department?

6 A. A couple of days after.

7 Q. Okay. And did you consider the spill
8 a major incident?

9 A. Yes.

10 Q. Okay. You said that you only heard
11 about it a couple of days afterward. If it was
12 a major incident, would you have wanted to know
13 about it sooner?

14 A. I was off all week.

15 Q. Okay. So then you never had occasion
16 to view the results of the spill; is that
17 correct?

18 A. No. Correct.

19 Q. Did anyone tell you about witnesses
20 who may have seen the oil spill?

21 A. No.

22 Q. Okay. Do you know William Sullivan?

23 A. Yes.

24 Q. And do you know what his position is

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